

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
HEIDI A. OJEDA
3 Assistant Federal Public Defender
Nevada Bar No. 12223
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Heidi_Ojeda@fd.org

7 Attorney for Edward Snoeck

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 EDWARD SNOECK,

15 Defendant.

Case No. 2:18-cr-00284-JCM-VCF

**Stipulation to Continue Supplement's
Deadline to Motion for
Compassionate Release
(Second Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.
20 Ojeda, Assistant Federal Public Defender, counsel for Edward Snoeck, request that the due date
21 for Mr. Snoeck's Supplement to Motion for Compassionate Release (ECF No. 142), be
22 extended from February 19, 2024, to March 19, 2024; and that the due date for the government's
23 response be extended until April 2, 2024.

24 This Stipulation is entered into for the following reasons:
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1 1. On January 5, 2024, Mr. Snoeck filed a motion seeking an order reducing his
2 sentence or modifying his judgment under the compassionate release statute at 18 U.S.C. §§
3 3582(c) and 3553(a). ECF No. 142.

4 2. Defense counsel has not had the opportunity to speak with Mr. Snoeck to discuss
5 related issues to the motion. Counsel had a legal call scheduled, but the BOP cancelled the call
6 the morning of and has not responded to requests to reschedule.

7 3. Defense counsel needs additional time to investigate Mr. Snoeck's personal and
8 family medical issues, which are pertinent to the supplement.

9 4. The additional time requested by the stipulation is made in good faith and not
10 for purposes of delay.

11 5. The defendant is in custody and agrees with the need for a continuance.

12 6. The parties agree to the continuance.

13 This is the first request for a continuance of the supplement deadline.

14 DATED this 16th day of February, 2024.

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16 RENE L. VALLADARES
17 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

18 By /s/ Heidi A. Ojeda
19 HEIDI A. OJEDA
20 Assistant Federal Public Defender

 By /s/ Jim W. Fang
 JIM W. FANG
 Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOECK,


Defendant.

Case No. 2:18-cr-00284-JCM-VCF

ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to Extend Deadline for filing her Supplement to Motion for Compassionate Release, that the Defendant's deadline to file his Supplement is extended to March 19, 2024; and that the Government's deadline to file its response is extended to April 2, 2024.

DATED February 16, 2024.


UNITED STATES DISTRICT JUDGE